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June 1, 2021

Via ECF

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Dreambuilder Investments, LLC v. MERSCORP Holdings, Inc.*
Case Number 19-cv-08937 (ER)

Your Honor:

This firm represents defendant MERSCORP Holdings, Inc. (“MERSCORP”) in connection with the above-referenced matter and writes in response to your April 23, 2021 Order (Docket No. 13) (the “Order”) granting the motion to withdraw as counsel for Plaintiff filed by The Wagoner Firm, PLLC and extending the deadline for the parties to submit a status letter through June 1, 2021.

Prior to the filing of the motion to withdraw, MERSCORP was actively engaged with prior counsel to try to reach a resolution between the parties, but was unable to do so. Although Plaintiff has not formally retained counsel, nor has anyone from Plaintiff reached out to the undersigned advising new counsel has been retained to date, MERSCORP would like to proceed with the litigation on its counterclaims for breach of contract and for a judgment authorizing the release of plaintiff’s liens which MERS continues to hold. As such, MERSCORP respectfully requests a conference be scheduled so that MERSCORP can proceed with filing a dispositive motion.

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We are available for a telephonic conference at the Court's convenience, if needed, and thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Andrea M. Roberts
Andrea M. Roberts

cc: Dreambuilder Investments, LLC (via email)